

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
EUDIS MANUEL SOSA, AKA	:	
EUDIS M. SOSA, AKA	:	
EUDIS SOSA,	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
EUDIS MANUEL SOSA, AKA	:	
EUDIS M. SOSA, AKA	:	
EUDIS SOSA,	:	
Respondent	:	CASE NO. 5-24-bk-01476-MJC

TRUSTEE’S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 11th day of April 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Agatha R. McHale, Esquire, and objects to the confirmation of the above-referenced Debtor’s Plan for the following reasons:

1. Debtor has not provided Trustee with information needed in order for Trustee to comply with § 1302(b)(6).
2. Trustee avers that Debtor’s Plan cannot be administered due to the lack of the following:
 - a. Debtor has not provided Trustee the Proof of Claim for Luzerne County Tax Claim Bureau.

WHEREFORE, Trustee alleges and avers that Debtor’s Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

/s/ Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

By: /s/ Agatha R. McHale, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 11th day of April 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Tullio DeLuca, Esquire
Law Office of Tullio DeLuca
381 North 9th Avenue
Scranton, PA 18504

/s/ Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee